

## **Remarks**

Dear Examiner:

I appreciated your writing the detailed explanations of the rejection, and these explanations will improve my future patents. In the event you wish that I elaborate verbally on the below, please call 713 771 1082. Again, if you find any invention worthy and not expressed in the claims, I would appreciate your writing the claims.

The remarks consist of an overview section starting on this page, and a detailed response to Detailed Action of the rejection starting on page 16.

### **Overview of Response to Detailed Action**

- I. Priority and Continuation. The rejection notes that there is no priority claimed and that the methods for building the virtual subdomains of the Sun-Choudhry card index are not included. Responding to this particular set of rejections is troublesome for me, as I don't know the correct procedure. I hope you will explain any correct procedural matters to me. Thank you.
  - a. Please note in Sun-Choudhry application [0001]—"Claiming Benefits Under 35 U.S.C. 120" "This application claim is related to U.S. application Ser. No. 09/476,632 filed by Azkar Choudhry on Dec. 31, 1999 which is commonly assigned with this application." Choudhry application subsequently became patent 6,442,602.
  - b. Furthermore, [0005]—"U.S. application Ser. Nos. 09/476,632 and 09/642,127, both filed by Azkar Choudhry on Dec. 31, 1999 and Aug. 18, 2000, respectively, are incorporated herein by reference in their entirety, including drawings and any microfiche appendices, and are hereby made a part of this application."

- c. Throughout the application and the initial response Paper 8 (USPTO received 1/5/2004), there is consistent incorporation of Choudhry.
- d. The specifications amendments above include update on Choudhry application turned into patent.
- e. The assignee for Choudhry and Sun-Choudhry is the same—WebAndNet Computing, as shown in the previously filed assignee paperwork. Chen Sun had filed a Doing Business As “WebAndNet” of Houston TX in 2/2/1997, a copy of DBA paperwork which is attached. Furthermore, his WebAndNet business card, Texas reseller certificate, and WebAndNet stationery are enclosed. Chen Sun has been sole proprietor of WebAndNet Computing ever since its inception, and Azkar Choudhry was an employee to Chen Sun at the time of the invention and had signed assignee to WebAndNet.
- f. Upon reviewing the Utility Patent Application transmittal, I noticed box 18 did not check “continuation”. This was a clerical and misunderstanding error. Box 18 should have stated that this is a continuation of prior application 09/476,632 (Choudhry). The specifications for patent application 09/476,632 (Choudhry), 09/642,127 (Choudhry 2), and this application were all written by the same patent agent; it was due to a misunderstanding and miscommunication that I had to subsequently sent in an incorrectly-completed transmittal letter for this application.
- g. As I best recall, I had called the USPTO patent assistance center regarding whether it was required to submit referenced specifications that are included in prior applications, and the response I received was that these aren't necessary, as the USPTO can retrieve these itself.
- h. It is my understanding that the microfiche for Choudhry (submitted by my patent agent) contained the programming code for both Choudhry and Sun-Choudhry. It is my understanding that Sun-Choudhry is intended as a continuation of Choudhry.
- i. I hope that Examiner will allow for the correction of these, and treat this application as a continuation of Choudhry.

II. Terminology. The rejection notes that the terminology “virtual subdomains” were used in Celik and Chandra and thus anticipated this invention.

- a. As can be seen from [0001] and [0005] above, Sun-Choudhry is a continuation of Choudhry, and the term “virtual subdomain” and “unregistered unrecognized subdomains” are defined in Choudhry.
- b. If Sun-Choudhry is not regarded as a continuation to Choudhry, please note that the terminology used still refer to Choudhry1 and Choudhry2. See [0037] “The virtual subdomain server is described in the related application....” [0026] “As the virtual subdomain which is described in the related and incorporated application is a dynamically created and dynamically managed addressing scheme....”
- c. The type of virtual subdomain in this application is one that is unregistered unrecognized by DNS, and as such, it has unusual properties, such as dynamic Internet subdomain URL updating-- [0026] [0037] above. Celik and Chandra did not anticipate this type of virtual subdomain. Celik and Chandra anticipated another meaning of virtual subdomains, meaning that the subdomain is created by hardware computer that is already hosting a domain; hence the term “virtual” subdomain or “virtually hosted subdomain (abbreviated as virtual subdomain)”, but with a different meaning. This standard virtual subdomain still had registered and recognized DNS names and did not have dynamic Internet updating.
- d. The distinguishing terminology differences between this application’s usage of “virtual subdomain” and the standard virtual subdomain described in “c.” above was explained in
  - a. [0018] Virtual subdomains are special cases of subdomains, which may or may not actually refer to a separate physical subdomain server from the domain server, but may refer to a directory or other software facility on the domain server. This is referred to as “hosting” the subdomain on the domain server....
  - b. [0026] As the virtual subdomain which is described in the related and incorporated application is a dynamically created and dynamically managed addressing scheme,

- c. [0037] The invention is realized by associating a web server script with a virtual subdomain server. Of course, the script may be co-resident within the same web server or house or hosted within different web servers. The virtual subdomain server is described in the related application.
- e. Prior to Choudhry, the “virtual subdomains”, as used in Celik and Chandra and in other standard DNS implementations, were not dynamically updatable. The dynamic updating made a significant improvement over the delays in standard DNS propagation and the administration of the set up of standard DNS subdomains, as would have been exhibited by Celik, Chandra, and standard subdomain DNS updating. This is elaborated in:
  - a. [0026] ...As the virtual subdomain which is described in the related and incorporated application is a dynamically created and dynamically managed addressing scheme, the webBIZdex itself may actually be a distributed database across multiple servers and may be dynamically reorganized and changed....
  - b. [0037] The invention is realized by associating a web server script with a virtual subdomain server.... The virtual subdomain server is described in the related application. The virtual subdomain server translates virtual subdomains to other types of Internet addressing schemes such as subdirectory names or other domains and subdomains. As this is done in real time, the virtual subdomain may be repointed to any other destination address as desired dynamically.
  - c. [0040] ...The web browser user may then simply hyperlink (57) or select any of the virtual subdomains, which will activate the process described in the related application whereby the virtual subdomain server intercepts the request for the unregistered virtual subdomain name and translates it to an actual web address. At this actual web address may be any web object, such as an electronic business card.
- f. I submit that the meaning of and in particular the implications of “virtual subdomain” used in Sun-Choudhry as compared to Celik and Chandra and

other prior arts are different. Sun-Choudhry “virtual subdomains” are as those defined in Choudhry.

III. Rejections of obviousness based on Celik and Chandra. Examiner’s rejection is primarily based on prior arts in Celik and Chandra.

- a. Sun-Choudhry is a continuation of Choudhry.
- b. Sun-Choudhry’s invention’s is superior to, different from, and non-obvious to Celik. An example will show this:
  - i. Consider the URL “<http://SteveJones.ABC.com>”, where “SteveJones” is the subdomain. Using the Sun-Choudhry’s invention, one simply types in his browser address box the URL <http://SteveJones.ABC.com> to access Steve Jones’s business card-- one step.
  - ii. Using Celik’s invention requires two steps. First, one accesses the card server, by addressing [www.ABC.com](http://www.ABC.com). Then at [www.ABC.com](http://www.ABC.com), one would type a search for “SteveJones”. As per Celik [Col 4 P5], “In step 160, the second personal computer 14 makes a request to the remote computer 16 for contacts information corresponding to the unique identification numbers contained in either the synchronizer or the personal information manager.“ Notice that the Celik card server is first accessed and then the unique identity number is accessed—two steps.
  - iii. Celik’s system contains an extra synchronizer to the remote system.
- c. Examiner further rejects based on that Chandra with Celik would make building Sun-Choudhry obvious.

i. Consider another example. In Sun-Choudhry, the two URLs “<http://SteveJones.ABC.com>” and “<http://SteveJones.DEF.com>” can coexist. Chandra’s system, as applied to the Internet, relies on unique subdomains, and in this case “SteveJones” would not be unique, and both URLs cannot belong to Chandra’s invention’s usage. To elaborate:

1. Chandra’s patent is difficult to read, but we can understand it best by noticing a couple of statements. His claim #1 explains the essence of his invention: “...assigning a unique user identifier to a network user....the personalized URL being based upon at least a portion of the unique user identifier prepended to a domain name.”
2. Hence, “SteveJones” could not be unique and be used by Chandra’s invention if it was prepended to multiple domain name.
3. This can be further understood by the examples given for Chandra’s examples—(Chandra, Col 6, line 15)—“Rohit77.eCode.com or bill+Clinton.eCode.com”, where “Rohit77” and “bill+Clinton” would likely be unique, but “Rohit” and “BillClinton”, unlikely to be unique.
4. Chandra’s Figure 4 also shows the logic of its creation “Is User Identifier Unique”, requiring an unique identifier to be prepended to a domain name (Figure 5 #620).

- ii. I submit, using the above examples, that Chandra itself and Chandra with Celik does not make Sun-Choudhry obvious because Chandra requires unique subdomains.
  - iii. Sun-Choudhry's non-obvious implementation over Chandra results in that multiple same-name subdomains can be used across the Internet, a crucial advantage in implementation of Internet URL-based business cards. This feature is exploited to further a series of inventions submitted by Chen Sun in subsequent US patent applications.
- d. Both Celik and Chandra rely on an "unique" identity for their entire networked system. In Celik's case this is an unique number or unique alphanumeric string in a specific card server. In Chandra case, this would be an unique subdomain name in relationship to the entire Internet.
- e. Sun-Choudhry card index's virtual subdomain address entity contains two unique identities--the virtual subdomain name is unique to its associated domain name, and the virtual subdomain's URL is unique to the Internet addressing. Because it has these two unique properties, it is superior to and different from Celik or Chandra or both combined. A reader of Celik or Chandra cannot obviously put the two together and conclude that Sun-Choudhry can be built and has the effects it has.
- f. Sun-Choudhry's virtual subdomain effects—using the unregistered unrecognized subdomains—also makes it different and non-obvious from using standard DNS subdomains (standard virtually hosted or real) in card indexes. Standard DNS subdomains (standard virtually hosted or real) require very different and often complex means of updating and propagating, and are less dynamic than Sun-Choudhry's means of updating. Thus, Chandra, Celik,

and standard DNS means are less capable because these require far more complex administration, as was detailed in Amendment B, Paper #8 filed 1/5/2004.

- g. As such, Sun-Choudhry's effects are non-obvious to either Celik, Chandra, or standard DNS subdomains.

## Numbered Response to Detailed Action

Response numbering corresponding to Detailed Action's numbering

### *Priority*

3-4. The specifications for the claim for priority has been amended.

Please also note that [0004] and [0005] indicated that the original intent included this claim of priority date.

[0004] Not applicable. INCORPORATION BY REFERENCE

[0005] U.S. application Ser. Nos. 09/476,632 and 09/642,127, both filed by Azkar Choudhry on Dec. 31, 1999 and Aug. 18, 2000, respectively, are incorporated herein by reference in their entirety, including drawings and any microfiche appendices, and are hereby made a part of this application.

Also, as explained in Amendment B Paper #8 received by USPTO on 1/5/2004, there are numerous references (p.10-15) throughout its remarks section that indicates the meaning of virtual subdomain, unregistered unrecognized subdomains, and dynamically created or dynamically managed subdomains refer to the meanings of these in Choudhry. Both Choudhry and Sun-Choudhry are assigned to Chen Sun, the primary applicant here, and it was intended that the language are same.

5.

1. amended. Furthermore, Figure 4 is referenced in [38]
2. amended
3. amended

7-9. As explained, this application is a continuation. If, however, Examiner, believes Terminal disclaimer is suitable, please advise, and I will submit.

8-9. Celik did not anticipate a dynamically changing identifier that the unique identifier is within an URL, with which there are two unique identifying components—the subdomain in relation to the domain and the subdomain-domain combination. These components enable for a single step addressing of the identifying card; whereas, Celik requires two-step addressing. Furthermore, the well-known, standard DNS methodologies, as seen in Celik and later in Chandra, did not anticipate a dynamically changing subdomain-domain combination, which is the essential entity used in this invention. Response “Overview” above provides a detailed explanation.

9. Sun-Choudhry is a continuation of Choudhry.

Additionally, as explained above, the distinguishing characteristic of this application is that now online business cards can be easily and dynamically created and updated, using URL syntax as the person’s entity. This is significant in that the subdomain-domain URL syntax for an individual is currently the most effective way to communicate an individual’s information that is humanly communicable and digitally manageable. This significance is further elaborated in patent applications submitted later by Chen Sun.

12, 13, 14. Sun-Choudhry is a continuation of Choudhry. Incorporation of Choudhry can be found in the amended specifications above.

Please also see [0001] and [0005] for meaning of virtual subdomains, and as explained in the Overview and Priority response sections above, as well as in p. 10-15 of Paper #8 (received by USPTO on 1/5/2004). Enablement issues are also further described in continuation patent application 09/642,127 (Choudhry2), also included in referenced patent applications.

16-18. The nature of the claims are definite, once the meaning of “virtual subdomain” and “unregistered unrecognized subdomain” are understood from the Choudhry patent, which is incorporated with this patent application.

17. amended in claims.

21-23. Sun-Choudhry is a continuation of Choudhry.

Also, as explained in the overview, Chandra relies on a “unique” subdomain name, when used with the entire Internet as the network. Sun-Choudhry is more capable in that subdomains can have the same names.

24-25. Sun-Choudhry is a continuation of Choudhry.

Also, as explained in the overview, Chandra relies on using an “unique” subdomain name, and Celik requires two step processes to access the web business identifier. Putting together Chandra and Celik would have resulted in an inferior system to Sun-Choudhry. Sun-Choudhry can have multiple identically named subdomains, and access to any one card is one-step; whereas, Celik would have required at least two. The effect here is non-obvious.

26-31. Sun-Choudhry is a continuation of Choudhry.

Furthermore, Celik envisioned two steps to retrieve web business card and required an extra synchronizer. Sun-Choudhry invention enabled for one step to retrieve web business card. This is explained in detail in the overview. The result here is superior and non-obvious.

26-31. Sun-Choudhry is a continuation of Choudhry.

33. Sun-Choudhry is a continuation of Choudhry, and the terms, virtual subdomain were described in Choudhry.

32-34.

Paper #8 explained the process whereby the DNS propagation delays and the difficulties in DNS setup would cause many difficulties in any Celik system. Such difficulties are not in Sun-Choudhry. Paper further explained that the unregistered and unrecognized subdomains had dynamic updating capabilities, which would have made it very advantageous. Sun-Choudhry improvements over both Celik and Chandra and standard DNS subdomain--in single address access and multiple identical subdomain naming and dynamic capabilities—are significant improvements. This improvement is used in subsequent Chen Sun patent applications to build a system of personal contacts management using URLs that advances contacts management.

Conditional Request for Constructive Assistance

Applicants have amended the claims of this application so that they are proper, definite, and define novel structure which is also unobvious. If, for any reason, this application is not believed to be in full condition for allowance, applicants respectfully request the constructive assistance and suggestions of the Examiner pursuant to M.P.E.P. 2173.02 and 707.07(j) in order that the undersigned can place this application in available condition as soon as possible and without the need for further proceeding.

Claims using “virtual subdomain” and “unregistered unrecognized” subdomains are similar. These terminologies were rewritten because of initial rejections by Examiner Moezzi.

Thank you very much for reviewing this paperwork, and I appreciate your further comments. Please do call, 713 771 1082, if you believe that verbal explanations are more suitable due to my possible misunderstanding of the patent procedures.

Respectfully,

Chen Sun

**WebAndNet**  
A Web Inventions eNterprise

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WINning Solutions



01-300  
(Rev. 12-01-14)

**TEXAS SALES AND USE TAX PERMIT**

This permit is not transferable and this side must be prominently displayed in your place of business.

You must obtain a new permit if there is a change of ownership, location, or business location name.

Type of permit

SALES AND USE TAX

Taxpayer number

3-20073-9923-4

Outlet number

00003

First business date

03/01/1999

SIC CODE: 5734

DESCRIPTION ON NEXT LINE:

Computer and Computer Software Stores  
BE SHOW THIS BUSINESS IN THE FOLLOWING LOCAL SALES TAX AUTHORITIES:  
CITY: HOUSTON  
TRANSIT: HOUSTON MTA

WEB AND NET COMPUTING  
4600 GULF FWY STE 125  
HOUSTON

TX 77023-3548

CHEN SUN

EFF: 03/01/1999  
EFF: 03/01/1999

CAROLE KEETON RYLANDER  
Comptroller of Public Accounts

YOU MAY NEED TO COLLECT SALES AND/OR USE TAX FOR OTHER LOCAL TAXING AUTHORITIES DEPENDING ON YOUR TYPE OF BUSINESS.  
If you have any questions regarding sales tax, you may contact the Texas State Comptroller's field office in your area or call 1-800-252-5555 toll free, nationwide. The Austin number is 512/463-4600. If you are calling from a Telecommunications Device for the Deaf (TDD), the toll free number is 1-800-248-4099, or in Austin, 512/463-4621.

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92355

02/12/97 400109618 \$11.00  
Assumed Name

This is to acknowledge receipt of certificate of operation under Assumed Name which was filed in my office for WEB AND NET, under the file number as shown on the cash register validation above, and indexed in the Assumed Name Records as prescribed by law.

The certificate shows CHEN SUN

to be the owner(s) of said business.

The period (not to exceed 10 years) during which the assumed name will be used is shown as \_\_\_\_\_

10 YEARS

Whenever there is a change of ownership, a withdrawal certificate shall be executed and duly acknowledged by the person or persons so withdrawing from or disposing of their interest in said business. Until such certificate has been filed, they shall remain liable for all debts incurred in the operation of said business.

Beverly B. Kaufman,  
County Clerk, Harris County

Shirley L. Wilson Deputy  
SHIRLEY L. WILSON



# WebAndNet

Computing  
A division of SunComp, since 1988

July 12, 2004

This is to confirm that Chen Sun is a sole proprietor doing business as WebAndNet Computing and WebAndNet. The assignee of patent 6,442,602 (Choudhry)-- Web and Net Computing, Houston, TX--is the sole proprietor Chen Sun.

Thank you,

Chen Sun  
President